



WASTEX RESEARCH, INC.

EPA Region 5 Records Ctr.



315962

November 17, 1983

Mr. Kenneth Mensing
Southern Region Manager
Land Field Operations Section
Division of Land Pollution Control
Illinois E.P.A.
113 West Main
Collinsville, IL 62234

Subject: LPC 16304538 - St. Clair County - E. St. Louis/Wastex.

Dear Mr. Mensing:

In your letter of November 3, 1983, you cited several sections of the rules of the Illinois Pollution Control Board where the Agency considered our facility to have apparent violations and asked for our response. As your recent inspections would have noted, we have entered a program of accelerated reduction of the drum inventory and a significant reduction has been accomplished to date. At this time all of the drums previously stored in buildings 31 and 35 have been removed or have been staged for processing. As these drums are removed we will begin working the open-top drums stored in building 16 and those in building 3 and 22 after those are completed. Some of the apparent violations noted appear to have resulted from this activity and the response on an item by item basis will so note.

Section 700.105 - The mechanized version of the solidification process has been included in the Part A but as noted in the attached Permit Application letter we have been unable to complete the installation of that process. The same materials that will be processed in the permitted process are to be processed using the alternate manual procedure. The letter to the Permit Section seeks approval of the alternate manual procedure.

Section 722.130 - On several occasions shipments of hazardous waste in drums have been subject to Department of Transportation inspections by state officers. These inspections have included the transportation equipment, the paperwork for the shipment, and the load itself. To date, no objections have been noted regarding the packaging of the waste.

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Sections 725.212 & 725.242 - A revised Closure Plan and cost estimate has been submitted as a part of the Part B application and copies have been supplied to the Agency.

Section 725.271 - A supply of overpack drums is maintained at the facility and leaking or suspect drums are placed in those overpacks or the material is removed from the drums. A drum is considered suspect when the condition of the drum indicates that continued storage or handling of that drum could cause a leak of material to occur.

Section 725.273 - The only drums stored at the facility with open tops are those in the old inventory stored in building 16. Other drums are opened only as necessary for processing. No additional open top drums have been or will be added to the storage inventory.

Section 725.274 - Container storage areas are inspected weekly and those inspections documented. Interim inspections are performed by the supervisory and operating personnel as they are working in an area. Inspections for leaks are also made by the security patrol two times each hour during non-operating periods. Inspections by security personnel are documented on the security shift log.

Section 725.276 - Drums containing hazardous waste are stored within 50 feet of the property line in only one area of the facility. The inside of the south wall of buildings 3 and 22 is approximately 42 feet from the property line and drums are presently stored against that wall. This wall is of masonry construction and is 13 inches thick and between the wall and the property line a buffer zone is created by a 6 foot high chain-link fence topped with barbed wire that is a minimum of 22 feet 9 inches from the wall. This building has been accepted by the State Fire Marshal's Office as having a fire rating in excess of two hours and the drums would appear to be well protected at the 42 feet distance from the property line. To alleviate the concern expressed by the Agency the storage pattern in these two buildings will be altered such that a minimum of 8 feet of clearance is provided from the south wall. This alteration will be made as the final step when we move into those buildings in our current accelerated drum reduction program.

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Section 275.294 - Tanks used for the storage of hazardous waste are inspected weekly on a formal basis by supervisory or technical personnel as required by this section. Those portions requiring inspection each operating day are inspected by the operating personnel prior to any use of the tanks for hazardous waste and verified by supervisory personnel.

Section 275.322 - The concrete retention basin under storage tanks ST-4, 5, 6, and 7 is not intended to be used as a surface impoundment as defined by this section but our inability to use our normal means of disposal has required us to accumulate contaminated water in the basin. Attached to this letter is one to the Permit Section requesting approval of the use of this basin as a surface impoundment.

Section 275.323 - As noted in the letter to the Permit Section discussed above, any dike to be installed will be protected by a layer of rock.

Section 275.326 - As of the date of this letter the level of the water in the basin under tanks ST-4 to 7 will be recorded daily with reference to the top of the concrete walls of the basin.

Section 275.328 - The closure and cost of closure of the retention basin under storage tanks ST-4 to 7 was included in the closure plan submitted for the facility.

Section 275.329 - The analysis of the liquid in the retention basin under tanks ST-4 to 7 submitted with the letter to the Permit Section discussed above show that the liquid is not ignitable. It will only be under emergency situations that ignitable liquids would enter the retention basin.

Section 21 (f) of the Illinois Environmental Protection Act - This facility has not received any hazardous waste for disposal at the facility and is not permitted to do so. The facility may generate and transport for disposal certain wastes but the payment of the fee specified at Section 21 (f) is the responsibility of the owner or operator of the site used for the disposal of hazardous waste.

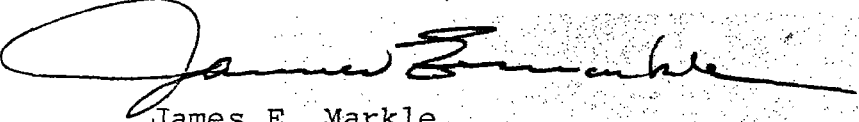
We have attempted to make a complete and definitive reply to your letter and hope that this letter and our current and past activities demonstrate the commitment made by Wastex Research to

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operate in compliance with the statutes and regulations pertaining to hazardous waste applicable in Illinois. We are under fiscal restraints but will endeavor to maximize the environmental benefit from any expenditures. Should additional information be required, please contact my office or that of Joe D. Burroughs, Environmental Engineer.

Sincerely,

WASTEX RESEARCH, INC.



James E. Markle,
President

Enclosure: Letters to Permit Section (Two)

cc: Phil Van Ness Enforcement Programs
Tom Immel, Corporate Attorney
Joe D. Burroughs, Environmental Engineer

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